

EXHIBIT 1

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ROSS & MORRISON

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 Attorneys for Plaintiff

FILED
 Superior Court Of California
 County Of Los Angeles

AUG 07 2015

By Paul So Deputy
 Clerk of Court

DBP Gregory Alarcon

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES

M.M., an individual,)	CASE NO.
)	
Plaintiff,)	BC590557
v.)	<u>COMPLAINT</u>
)	1. VIOLATION OF LAB CODE S
)	432.7
)	2. VIOLATION B&P CODE S
)	17200
WALGREEN CO., a corporation;)	3. PRIVATE ATTORNEYS
and DOES 1-100,)	GENERAL ACT (LABOR CODE
)	\$2998 ET SEQ.)
Defendants.)	
)	<u>DEMAND FOR JURY TRIAL</u>

CASE SUMMARY. On January 1, 2014 Labor Code S 432.7 was amended to prohibit employers from inquiring into, or utilizing any information "concerning a conviction that has been judicially dismissed." Plaintiff had a conviction which was judicially dismissed on July 3, 2014. On August 1, 2014, plaintiff began employment with defendant and filled application. Defendant learned of plaintiff's conviction through a background check, and on or around August 14, 2014, advised plaintiff that he was being terminated because of his conviction. Plaintiff explained that his conviction had been dismissed, but defendant refused to change its decision thus violating Labor Code S 432.7. Plaintiff alleges

COMPLAINT

complaint.wpdun

08/07/2015

CIT/DOGE: BC590557
 LEA/DEF#: 14
 RECEIPT BY CO#53907900
 DATE PAID 08/07/15 02:39 PM
 PAYMENT: \$435.00
 RECEIVED
 CHECK: \$435.00
 CASH: \$0.00
 CHARGE: \$0.00
 CARD: \$0.00

IDENTIFICATION OF PARTIES

1. Plaintiff is an individual residing in Los Angeles County, California, suing as "M.M." to protect his identity (see Starbucks Corp. v. Sup. Ct (2008) 168 Cal. App. 4th 1436, 1452).

2. Defendant Walgreen Co., and/or related/successor entity(ies), including Walgreens Boots Alliance, Inc., "Walgreens" and/or "Walgreens Co.," is/are corporation(s) doing business in Los Angeles County, California.

3. The true names and capacities of the defendants named as Does 1 through 100 are presently unknown to plaintiff. Plaintiff will amend to substitute the names of such defendants when known. Plaintiff is informed and believes, and based thereon alleges, that each of the Doe defendants was responsible for the events and damages alleged herein, including that defendant(s) were the agents or employees of one or more of the remaining defendants, and in doing the acts herein alleged, was acting within the course and scope of such agency and employment, or otherwise liable. The named and Doe defendants are sometimes collectively referred to as "defendant."

4. On information and belief, there exists, and at all relevant times there has existed, a unity of ownership and interest between defendants, such that any individuality and separateness between said defendants has ceased, and each of the defendants is the alter ego of the other; and adherence to the fiction of separate existence of the defendants would permit an abuse of the corporate privilege and would sanction fraud and promote injustice.

/ / /

FACTS COMMON TO ALL CAUSES OF ACTION

5. On or about July 3, 2014 plaintiff had a criminal conviction judicially dismissed pursuant to 1203.4 of the Penal Code.

6. On or about August 1, 2014, plaintiff began working for defendant at its store in Redondo Beach, California (Store #6904). As part of the hiring process, plaintiff filled out a job application, which, on information and belief, sought impermissible information regarding judicially dismissed convictions.

7. On information and belief, on or around August 8, 2014, defendant learned of plaintiff's conviction through a background check, Work Order #42031970.

8. On or around August 14, 2014, defendant advised plaintiff that he was being terminated because of his conviction. Plaintiff explained that his conviction had been dismissed, but defendant refused to change its decision.

9. Defendant's termination of plaintiff caused plaintiff to suffer harm, including, without limitation, lost past and future earnings, damage to career path, and other economic loss, in an amount to be proven at trial.

10. Defendant's termination of plaintiff caused plaintiff to suffer psychological and emotional distress, in an amount to be proven at trial.

11. Defendant's conduct was despicable, cruel, unjust and done with a conscious disregard of plaintiff's rights, such as to constitute oppression, fraud or malice under Civil Code Section 3294.

1 FIRST CAUSE OF ACTION

2 Violation of Lab. Code § 432.7, et seq.

3 12. Paragraphs 1 through 11 are incorporated.

4 13. Defendant's conduct violated section 432.7 of the
5 Labor Code, as amended on January 1, 2014, including, without
6 limitation, by:

7 a. Asking plaintiff, and/or other job applicants or
8 employees on and after January 1, 2014, to disclose, through any
9 written form and/or verbally, information concerning a
10 conviction that has been judicially dismissed, including
11 pursuant to 1203.4 of the Penal Code;

12 b. Seeking from third party sources on or after
13 January 1, 2014, information regarding a conviction that has
14 been judicially dismissed, including pursuant to 1203.4 of the
15 Penal Code, regarding plaintiff and/or other job applicants or
16 employees; and/or

17 c. Utilizing a conviction that has been judicially
18 dismissed, including pursuant to 1203.4 of the Penal Code, as a
19 factor in determining any condition of employment, including
20 hiring, for plaintiff, and/or other job applicants or employees
21 on and after January 1, 2014.

22 SECOND CAUSE OF ACTION

23 Violation of Business and Professions Code § 17200

24 14. Paragraphs 1 through 13 are incorporated.

25 15. Defendant's conduct, as alleged, constitutes an
26 unlawful, and/or deceptive business practice in violation of
27 Business and Professions Code §§ 17200, et seq.

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THIRD CAUSE OF ACTION

Private Attorneys General Act (Labor Code §2998 et seq.)

16. Paragraphs 1-15 are incorporated.

17. In addition to the foregoing, plaintiff seeks to recover civil penalties on behalf of all current and former employees and/or applicants of defendant for any provision of the Labor Code as defined in Labor Code § 2699(a), including all penalties with respect to any and all applicable Sections of the Labor Code set forth in Labor Code § 2699.5, specifically, including, without limitation, Labor Code § 432.7.

18. Exhaustion of administrative remedies. On August 6, 2015, plaintiff sent a timely written notice via certified mail to the Labor and Workforce Development Agency ("LWDA") of the contents of this claim. Plaintiff reserves the right amend this claim to allege notice/response from the LWDA.

WHEREFORE, plaintiff prays for judgment as follows:

1. Compensatory damages, according to proof;
2. Punitive damages, according to proof;
3. Injunctive relief, including, without limitation, precluding defendant from (a) making inappropriate job inquiries, (b) obtaining inappropriate information, and/or (c) utilizing such information in violation of Labor Code § 432.7;
4. All applicable penalties including, without limitation, pursuant to Labor Code § 432.7(c);
5. Prejudgment interest;
6. Costs of suit including attorneys fees (including, without limitation, pursuant to Lab. Code § 432.7(c)); and

1 7. Such other and further relief as proper.

2 August 6, 2015

ROSS & MORRISON

3
4 By: 

Gary B. Ross

5 Andrew D. Morrison

6 Attorneys for Plaintiff

7
8 DEMAND FOR JURY TRIAL

9 Plaintiff hereby demands a trial by jury in this action.

10 August 6, 2015

ROSS & MORRISON

11 By: 

Gary B. Ross

12 Andrew D. Morrison

13 Attorneys for Plaintiff

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51021/07/2015

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Andrew D. Morrison, Esq. (SBN 144216) Ross & Morrison 315 S. Beverly Dr., Ste. 410 Beverly Hills, CA 90212 TELEPHONE NO.: 310.285.0391 FAX NO.: 310.285.6083 ATTORNEY FOR (Name): Plaintiff	FOR COURT USE ONLY FILED Superior Court Of California County Of Los Angeles AUG 07 2015 JUDGE: _____ By <u>Paul So</u> , Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: _____ CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk	
CASE NAME: M.M. v. WALGREEN CO., etc., et al.	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
CASE NUMBER: BC 590557 JUDGE: _____ DEPT: _____	

Items 1–6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/DP/DW (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/DP/DW (23) Non-PI/DP/DW (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/DP/DW tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court f. <input type="checkbox"/> Substantial postjudgment judicial supervision
--	--

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): **3**

5. This case ☒ is ☐ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: August 7, 2015

Andrew D. Morrison

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

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SHORT TITLE: M.M. v. WALGREEN CO., etc., et al.	CASE NUMBER BC 590557
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 2 ☐ HOURS/ ☒ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5. 1., 2., 3., 5.
		<input type="checkbox"/> A6027 Other Contract Disputes (not including real estate transactions)	1., 2., 3., 5.

SHORT TITLE: M.M. v. WALGREEN CO., etc., et al.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE:	M.M. v. WALGREEN CO., etc., et al.	CASE NUMBER	
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., **Step 3** on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input checked="" type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input checked="" type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 535 Pacific Coast Highway
CITY: Redondo Beach	STATE: CA	ZIP CODE: 90277	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: August 7, 2015

(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

Q. 10. 10. 10. 10. 10. 10. 10. 10.

**Employment Background Reporting**

8/22/2014

Case #: 42031970

MILES MORRISON
518 EAST OAK AVE.
EL SEGUNDO, CA 90245

WGC

Dear MILES MORRISON:

Based in whole or in part on information contained in a recently obtained consumer report on you, Walgreens Co. has elected not to extend you an offer of employment. The information in the report that was previously sent to you was obtained from:

General Information Services
Disclosure Department
P.O. Box 353
Chapin, SC 29036
Toll-free telephone no.: 1-866-265-4917
Toll-free fax no.: 1-866-265-4921

GIS did not make the decision not to hire you, and is unable to provide you with specific reasons why you were not hired.

Please note that you were previously sent a copy of your report, A Summary of Your Rights under the Fair Credit Reporting Act and were provided the opportunity to dispute the accuracy or completeness of any information contained in the report with GIS before any adverse action was taken. You also have the right to obtain an additional free copy of the report within 60 days of your receipt of this letter by contacting General Information Services at the address or phone number above.

If you believe there is inaccurate information in your report, under the FCRA and state law, you also have the right to dispute the accuracy or completeness of any information in the report by contacting the consumer reporting agency above.

Massachusetts applicants or employees only (this section applies only if the report referenced above is a credit report): You have the right to obtain a free copy of your credit report within sixty days from the consumer credit reporting agency which has been identified on this notice. The consumer credit reporting agency must provide someone to help you interpret the information on your credit report. Each calendar year you are entitled to receive, upon request, one free consumer report. You have the right to dispute inaccurate information by contacting the consumer credit reporting agency directly. If you have notified a consumer credit reporting agency in writing that you dispute the accuracy of information in your file, the agency must then, within thirty business days, reinvestigate and modify or remove inaccurate information. The consumer credit reporting agency may not charge a fee for this service. If reinvestigation does not resolve the dispute to your satisfaction, you may send a letter to the consumer credit reporting agency, to be kept in your file, explaining why you think the record is inaccurate. The consumer credit reporting agency must include your statement about the disputed information in a report it issues about you.

California applicants or employees only (this section applies only if the report referenced above is a credit report): You have the right to obtain a free copy of your credit report within 60 days from the consumer credit reporting agency which has been identified on this notice and from any other consumer credit reporting agency which compiles and maintains files on consumers on a nationwide basis. Under California law, you also have the right to dispute with the consumer reporting agency the accuracy or completeness of any information in the report.

Thank you for considering employment with Walgreens Co..

Sincerely,

General Information Services on behalf of Walgreens Co.

Enc.: